

JAMES M. BAKER
MAYOR

City of Wilmington
Delaware

LOUIS L. REDDING - CITY/COUNTY BUILDING
800 FRENCH STREET
WILMINGTON, DELAWARE
19801 - 3537



Law Department
(302) 576-2175

January 14, 2008

Robert D. Brown
SBI #231393
Howard R. Young Correctional Institution
P.O. Box 9561
Wilmington, DE 19809

RE: Robert D. Brown v. Wilmington Police Officers Rinehart and Drysdale
C.A. No. 07-023 SLR

Dear Mr. Brown:

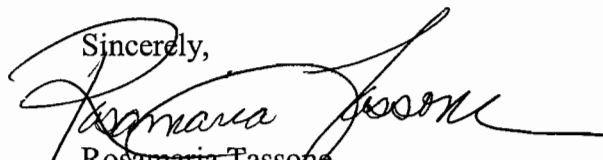
In accordance with the Court's Order of December 12, 2007, enclosed are the documents in Defendants' possession which are responsive to your Motion to Compel Discovery.

1. Wilmington Police Department Defensive Tactics Report dated April 16, 2006;
2. Wilmington Police Department Initial Crime Report dated April 16, 2006;
3. Handwritten notes of Defendant Drysdale;
4. Christiana Care Health Services - Wilmington Hospital Discharge Instructions dated April 16, 2006;
5. Wilmington Police Department - Directive 7.9 - Use of Force;
6. Wilmington Police Department Police Officer's Manual Index. Although you have requested the entire Manual, it is over 500 pages and many of the Directives are irrelevant and would not lead to the discovery of relevant information. As such, Defendants object to the production of the entire Manual. However, I have enclosed the Manual index. Should you determine that there are other Directives other than Directive 7.9 - Use of Force, which I have enclosed, please advise me and I will provide them to you should they fall under the applicable Rules of Discovery.

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Regarding your request that the Defendants' subpoena your witness, Ms. Grier, please be advised that the subpoenaing of your witness is your responsibility not the Defendants.

Sincerely,

A handwritten signature in dark ink, appearing to read "Rosamaria Tassone", with a long, sweeping horizontal stroke extending to the right.

Rosamaria Tassone
First Assistant City Solicitor

Enclosures

cc: Clerk of Court (w/encl.)